

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**PLAINTIFFS' MOTION FOR LEAVE TO COMPLETE LIMITED THIRD-
PARTY DISCOVERY AFTER THE FACT DISCOVERY DEADLINE**

Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, "Smartmatic"), by and through their undersigned counsel, hereby move this Court for an order allowing them to take third-party discovery from Mary Fanning and Conan Hayes after the October 20, 2023, deadline to complete fact discovery, if necessary. The reasons for this motion are set forth in Smartmatic's Memorandum in Support of Plaintiffs' Motion to Complete Limited Third-Party Discovery After the Fact Discovery Deadline and accompanying exhibits.

Dated: September 27, 2023

Respectfully submitted,

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